

# BORRELLI & ASSOCIATES

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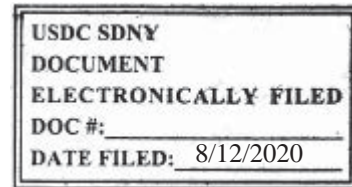
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August 6, 2020

Via ECF

The Honorable Alison J. Nathan  
United States District Judge for the  
Southern District of New York  
40 Foley Square  
New York, New York 10007



Re: *Israel Martinez, et al. v. JLM Decorating, Inc., et al.*  
Docket No.: 20-cv-02969 (AJN)

Dear Judge Nathan:

As the Court is aware, this firm represents Named-Plaintiff Israel Martinez, as well as opt-in Plaintiffs Juan Carlos Sanchez Benites and Rafael Brito (collectively as "Plaintiffs"), in the above-referenced putative collective and class action case alleging wage violations under the Fair Labor Standards Act and the New York Labor Law against Defendants JLM Decorating, Inc., JLM Decorating NYC Inc., Cosmopolitan Interior NY Corporation, Moshe Gold, individually, and Josafath Arias, individually. As the Court is further aware, on July 8, 2020, the Court so-ordered a Civil Case Management Plan, setting forth August 10, 2020, as the date for Plaintiffs to file their conditional certification motion. We write now, with Defendants' consent, in accordance with Rule 1(D) of Your Honor's Individual Practice Rules, to respectfully request a twenty-one-day extension of Plaintiffs' deadline to file this motion, extending the deadline from August 10 to August 31, 2020.

The reason for the requested extension is that our office has been without power or access to the internet for the previous two days due to the damage caused by Tropical Storm Isaias, which has frustrated efforts to draft the motion. Additionally, this creates logistical hurdles with respect to the Plaintiffs reviewing the motion papers and executing the requisite documents. Therefore, out of an abundance of caution, Plaintiffs respectfully propose to revise the briefing schedule as follows: **Opening Brief due August 31, 2020; Opposition Brief due September 21, 2020; and Reply Brief due September 30, 2020.** This is Plaintiffs' first request for such relief.

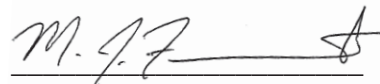
SO ORDERED.

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

8/10/2020

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. J. Farnworth", with a stylized flourish at the end.

Matthew J. Farnworth, Esq.

*For the Firm*

To: All counsel *via* ECF